1 Stephen M. Reynolds, CBN 148902 **Reynolds Law Corporation** 2 424 2nd Street, Ste. A Davis, CA 95616 3 (530) 297-5030 Phone (530) 297-5077 Fax 4 sreynolds@lr-law.net email 5 Attorney for Chapter 11 Debtor 6 Victoria Gewalt 7 UNITED STATES BANKRUPTCY COURT 8 EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION 9 Case No. 21-20600-C-11 In re: 10 DCN: RLC-5 Victoria Gewalt, 11 No Hearing Necessary 12 Debtors Judge Christopher M. Klein 13 APPLICATION TO APPROVE EMPLOYMENT OF REALTOR 14 [11 U.S.C. § 327] 15 Victoria Gewalt, the Chapter 11 Debtor and Debtor in Possession in the above-captioned 16 matter (hereinafter "Debtor"), hereby requests authority to employ Melinda Scott as her 17 realtor in this case and represents as follows: 18 1. The present case was filed on February 22, 2021 as a voluntary Chapter 11 19 case. 20 2. Debtor wishes to employ Melinda Scott as her realtor to market the subject property. Ms. Scott has been a licensed realtor since 1991. Debtor selected Ms. Scott 21 because she is experienced in real estate marketing and sales, familiar with the Texas market 22 and is well qualified to represent the Debtor. 23 3. The Debtor anticipates that the following professional services will be 24 required: 25 Market and sell the property in Franklin, TX owned by the Debtor. a. 26 4. Ms. Scott does not have any connections with the Debtor, its creditors, any 27 other party in interest, their respective attorneys or accountants, the U.S. Trustee, or any person employed in the Office of the U.S. Trustee. 28

- 5. None of the conditions discussed in the Scott Declaration would preclude employment. Ms. Scott does not hold or represent any interest adverse to the estate.
- 6. Ms. Scott has not agreed to share with any person or entity any compensation she may be awarded in this case, except among those in her employ. No other payments have been made or promised to Ms. Scott in connection with this employment.
- 7. The services to be provided by Ms. Scott are in the best interest of the case.

 The Debtor believes it is essential that counsel be employed to represent it in the present case.

WHEREFORE, the Debtor respectfully requests that she be authorized and empowered to employ Melinda Scott as realtor in aid of these proceedings from March 8, 2021, forward, as for such other and further relief as the Court may deem proper under the circumstances.

Dated: March 12, 2021

REYNOLDS LAW CORPORATION

/s/Stephen-M. Reynolds
Stephen M. Reynolds
Attorney for Debtor

APPLICATION TO APPROVE EMPLOYMENT OF REALTOR